

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CASSANDRA PETTWAY,

Plaintiff,

v.

RYAN SWANSON & CLEVELAND PLLC, et
al.,

Defendants.

Case No. 2:19-cv-00204-JLR

**STIPULATION AND ORDER FOR
RELIEF FROM DISCOVERY
CUTOFF DEADLINE**

The Parties, by and through their respective counsel, respectfully and jointly move the Court for an order permitting one deposition past the discovery deadline in this matter. Plaintiff commenced this case on December 11, 2018. The matter was removed to this Court on February 13, 2019 [Dkt 1]. On April 8, 2019, the Court entered its Order Setting Trial Dates and Related Dates [Dkt 12]. The discovery cutoff date was set for March 30, 2020.

The Parties agreed to hold off on the deposition of a witness, Beverly Stewart, due to a prolonged family emergency for that witness. In February 2020, the Parties resumed discussions on scheduling the deposition of Ms. Stewart and agreed on a date of March 26, 2020. Prior to March 26, 2020, the State of Washington was ordered to engage in social distancing protocols in response to the COVID-19 crisis. As a result of these protocols, the Parties were unable to timely

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1 and adequately make the necessary arrangements to limit the potential exposure of COVID-19 to
2 the attorneys and the witness before the March 30, 2020 discovery completion date.

3 In accordance with the foregoing, the Parties respectfully request a 30-day extension of the
4 discovery completion date to May 10, 2020, for the sole and limited purpose of taking the
5 deposition of Beverly Stewart.

6 IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

7 Dated this 30th day of March 2020.
8

9 /s/ Kevin P. Smith

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/s/ Kathy Feldman

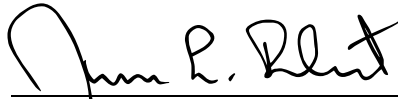
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1 PURSUANT TO STIPULATION, IT IS SO ORDERD.

2 DATED this 1st day of April 2020.

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5 THE HONORABLE JAMES L. ROBART
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